

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

-----X
RUTH CALDERÓN-CARDONA for the ESTATES OF :
CARMELO CALDERÓN-MOLINA AND ELADIA :
CARDONA-ROSARIO, et al., :
:
Plaintiffs, :
:
vs. : Civil Action No.: 08-1367(FAB)
:
DEMOCRATIC PEOPLE’S REPUBLIC OF KOREA, :
a.k.a. NORTH KOREA, et al. :
:
:
Defendants. :
-----X

MOTION TO SUBSTITUTE PARTY OF INTEREST

TO THE HONORABLE COURT:

Plaintiffs, by the undersigned counsel, hereby move before this Court for an Order substituting Ángel Luis Ramírez Colón, sole and universal heir of plaintiff Pablo Tirado-Ayala, as a plaintiff and party of interest in this matter.

In support of their motion, the plaintiffs state as follows:

1. This is a civil action for wrongful death, personal injury, and related torts brought under the Foreign Sovereign Immunities Act (“FSIA”), 28 U.S.C. § 1602 *et seq.*, by the estate and families of U.S. nationals who were murdered or otherwise harmed as the result of a terrorist attack in Israel’s Lod Airport on May 30, 1972.

2. The Complaint in this matter was filed on March 27, 2008. Pablo Tirado-Ayala is a named plaintiff in the action.

3. A trial in this matter was held on December 2 and 3, 2009.

4. On December 21, 2009, Pablo Tirado-Ayala passed away. (A copy of Mr. Tirado-Ayala's Death Certificate, certified translation, and Certificate of Accuracy are attached hereto as Exhibit A).

5. Pablo Tirado-Ayala left a Last Will and Testament dated August 11, 1992. (A copy of Mr. Tirado-Ayala's Last Will and Testament, certified translation, and Certificate of Accuracy are attached hereto as Exhibit B).

6. On June 8, 2010, the Office of the Director of Notarial Inspection ("Oficina del Director de Inspección de Notarías") issued a Certification that no will other than the August 11, 1992 Last Will and Testament of Pablo Tirado-Ayala had been recorded. (A copy of the Certification, certified translation, and Certificate of Accuracy are attached hereto as Exhibit C).

7. Ángel Luis Ramírez Colón has been identified as the sole and universal heir of Pablo Tirado-Ayala, as set forth within the Fourth Clause of said Last Will and Testament.

8. Based upon the foregoing, Plaintiffs seek to substitute Ángel Luis Ramírez Colón as the party of interest on behalf of Pablo Tirado-Ayala and his estate in this matter.

WHEREFORE, plaintiffs request that the Court permit the substitution of Ángel Luis Ramírez Colón as a plaintiff in this matter on behalf of Pablo Tirado-Ayala and his estate.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 22nd day of June, 2010.

S/ Manuel San Juan

USDC-PR 204706
P.O. Box 9023587
San Juan, Puerto Rico 00902-3587
Tel.: (787) 723-6637; 723-6669
Facsimile: (787) 725-2932

Attorneys for Plaintiffs
Gary M. Osen
Joshua D. Glatter
Naomi B. Weinberg
Aaron Schlanger
700 Kinderkamack Road
Oradell, New Jersey 07649
Tel.: (201) 265-6400
Facsimile: (201) 265-0303

NITSANA DARSHAN-LEITNER &
ASSOCIATES
Nitsana Darshan-Leitner, Esq.
11 Havatikim Street
Petah Tikva, 49389 Israel
Telephone: (972) 03-7361519
Facsimile: (972) 03-7361520